Final EIR Introduction

<u>This section has been changed subsequent to public review of the February 2005 Draft EIR and the April 2008 Revised Draft EIR as follows:</u>

- 1. Clarification that certain impacts associated with the Applicant's Preferred Project would be avoided with implementation of Reduced Project Alternative I.
- 2. Clarification of the TIF Fee.
- 3. Certain goal consistency analysis updated to reflect the Fire Protection Plan requirements.

2.7 Land Use/Planning

2.7.1 Existing Conditions

As discussed in Section 1.4, the project area is currently utilized as a camp and retreat center by the Salvation Army, with camp buildings located in the eastern, more level areas. Much of the project area is relatively undeveloped. The site is zoned A-70, Limited Agriculture, under the County of San Diego. Under this designation, non-profit camping areas, a Major Impact Services and Utilities Use Type, is permitted upon issuance of a Major Use Permit. The General Plan land use designation for the site is Multiple Rural Use (18), and the regional land use categories are Rural Development Area and Estate Development. The Multiple Rural Use designation permits development other than single-family homes when the development would: 1) result in no significant unmitigable adverse environmental impacts; 2) result in only minimal erosion and fire problems, if any; and 3) would require no urban levels of service.

2.7.1.1 Existing Regulations

Land use plans that apply to the project include the County General Plan, including the Ramona Community Plan and Ramona Design Guidelines. The following includes a brief summary of these land use plans.

A. General Plan

The San Diego County General Plan is a comprehensive long-range planning document that outlines future development and provision of services within the unincorporated San Diego County. The County General Plan consists of a series of planning goals and policy statements supported by narrative text, tables and graphics.

B. Ramona Community Plan

The land area covered by the County General Plan is divided into various community planning areas that focus and refine each of the broad General Plan element goals and policies for specific geographic areas within the County. The project site is located in the southwest portion of the Ramona Community Planning Area, within the County of San Diego (Figure 1-2). Ramona is a rural community with an abundance of unique natural topographic features that contribute to its rural character and setting. Some of the more prominent topographic features in the Community Planning Area include floodways, ridgelines, oak groves, and riding and hiking trails.

The intent of the Ramona Community Plan is "to maintain the rural atmosphere of the Planning Area while accommodating Ramona's share of San Diego's regional growth" and to "prevent urban-type developments outside the Town Center" (Ramona Community Plan, 1995). The Ramona Community Plan generally implements these goals through policies that encourage a gradual decrease in density from the Town Center to the western and eastern portions of the Planning Area (Ramona community Plan, 1995). The Community Plan provides several goal statements addressing preservation of the existing community character that apply to the proposed project including community character; land use; circulation; scenic highways; noise; public facilities services and safety; conservation; open space; and recreation.

C. Ramona Design Guidelines

The Ramona Community Plan has established a design review process that is required for approval of certain types of development within the Ramona Community Planning Area. The Guidelines establish criteria that are used by the planning group to evaluate characteristics of a development that would have an impact on neighboring properties and community character. The primary goal of the Ramona Design Guidelines is to ensure that every new development carefully consider the community context in which it would be located and makes a conscientious effort to develop a compatible relationship to the natural setting, neighboring properties and community design goals (Ramona Design Guidelines, 1993).

2.7.2 Thresholds of Significance

In accordance with CEQA Guidelines Appendix G and the Ramona Community Plan, the project would have a significant Land Use/Planning impact if it would:

- Cause land uses incompatible with existing uses or character of the community (County of San Diego, 1995);
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect (State of California, 2002); or
- Physically divide an established community (State of California, 2002);.

2.7.3 Analysis of Project Effects and Determination as to Significance

2.7.3.1 Land Use Compatibility/Community Character

AUnder the Applicant's Preferred Project, at full capacity the camp would accommodate a maximum of 748 people (i.e., users, staff and other support personnel). Similar to the existing facility, peak attendance is expected during the summer, when weekly summer youth camps are held. The types of activities proposed would be an expansion of existing uses, which include hiking, nature walks, arts and crafts, recreation, retreats, and special events. The hours of operation for the expanded facility would be similar to the existing facility.

The project proposes to expand the existing Salvation Army Divisional Camp and Retreat in a logical and coordinated fashion that is sensitive to the existing environment, provides for habitat protection, is

aesthetically pleasing, reinforces community identity, and promotes public health, safety and welfare. The Salvation Army Divisional Camp is envisioned as a low-density, planned camping facility. Table 2.7-1 illustrates the difference between the existing and proposed development acreages. The proposed project will reinforce the community identity of Ramona through implementation of design elements consistent with the rural character of the surrounding community. Specific project design elements include low-scale, one- and two-story structures that would be clustered in five general areas to minimize building massing, landform alteration and vegetation removal. Substantial open space has also been worked into the site plan to minimize disruption to the natural form of the terrain, and to minimize building massing. The design treatment of the proposed buildings would be rustic in character, built with wood, brick or masonry, and finished with exterior earth-tone colors.

The total proposed building and lot coverage is estimated at only two percent. Most buildings are relatively small in scale (1-2 stories). Larger buildings proposed are of similar scale to barns, stables, or storage structures for agricultural equipment – all of which exist in areas immediately surrounding the camp. In addition, the project includes a Landscape Concept Plan that includes substantial landscaping to soften and screen proposed buildings with native drought-tolerant species that are consistent with existing on-site vegetation.

2.7.3.2 Consistency with Applicable Land Use Plans and Policies

The proposed Salvation Army Divisional Camp and Retreat project has been designed to be consistent with the goals and policies set forth in the San Diego County General Plan, including the Ramona Community Plan and Ramona Design Guidelines. The following discussion includes each goal and policy applicable to the project, an analysis of project consistency or conformance, or rationale for why a specified goal or policy is not applicable to the project. Please refer to EIR Sections 2.4 and 2.5 for an analysis of project consistency or conformance with applicable noise and aesthetic goals and policies, respectively.

Please refer to EIR Section 2.2.1 for an outline of applicable habitat and natural community planning documents and EIR Section 2.2.3 for an analysis of project consistency with applicable goals and policies of these documents.

2.7.3.3 Divide Established Community

The proposed project would be located in an area surrounded by a commercial/retail horse breeding ranch and relatively low-density, ranch and estate-style development on the north and east, extremely low-density development on the south, and the Iron Mountain Resource Conservation Area to the west. The project involves the expansion of an existing use within a rural area. As such, the proposed project would not isolate surrounding uses or divide an established community.

A. General Plan

Open Space Element

General Open Space Element Goals:

"Conserve scarce natural resources and lands needed for vital natural processes and managed production resources."

"Conserve open spaces needed for recreation, educational and scientific activities."

"Encourage and preserve those open space uses that distinguish and separate communities."

By generally avoiding development in sensitive habitats and wildlife corridors, preserving open space, the proposed project contributes to the County's goal to conserve scarce natural resources and lands needed for vital natural processes and managed production resources.

The Salvation Army camp is and would continue to be devoted to providing open space for recreational, educational and scientific activities for San Diego-area youth. Much of the camp would remain undeveloped with portions used for outdoor recreational activities under the proposed project. The proposed Nature Study and Educational Camp would be devoted to hands-on investigations of the natural world in order to promote scientific understanding and appreciation among San Diego-area youth. By retaining open space on-site and providing access and education to San Diego-area youth, the proposed project contributes to the goal to conserve open space needed for recreation, educational and scientific activities.

As an open space area located on the perimeter of the more developed Ramona area, the Salvation Army Divisional Camp provides an open space barrier between developed areas and more open, undeveloped spaces. If the area were to be developed for housing or other uses consistent with the General and Community Plan Designations, the area would not provide an open space barrier between communities. By continuing its use as a recreational camp with relatively low levels of development and vast areas devoted to open space, the proposed project contributes to the goal to preserve open space that distinguishes and separates communities.

Countywide Recreation Area Goal:

"Provide areas of natural beauty for recreation, visual enjoyment, education, scientific and group activities and preserve plant and animal habitat areas, as well as enhance the physical, mental and spiritual well being of County residents and visitors."

The project proposes to enhance the camp by providing improved educational, scientific, recreational and group activities in an area of natural beauty. The proposed project would improve the existing Salvation Army Divisional Camp and Retreat to include facilities such as an education center and recreation areas for the youth and community of the San Diego area. The project would serve as an area for groups from the local community to camp and learn about the natural environment while leaving much of the area in an undeveloped state. The project contributes to the preservation of plant and animal habitats through the avoidance of sensitive habitats and the dedication of the aforementioned open space easements. By improving facilities at the camp while leaving much of the site in its natural state, the proposed project provides access to areas of natural beauty for recreation, visual enjoyment, education, scientific and group activities while preserving plant and animal habitat areas that contribute to the physical, mental and spiritual well-being of San Diego area residents.

Conservation of Resources and Natural Processes Goals:

"Encourage the conservation of areas with sensitive plant or irreplaceable, high quality plant and animal communities."

"Encourage the preservation of significant natural features of the County, including beaches, lagoons, shoreline, canyons, bluffs, mountain peaks, and major rock outcroppings."

As previously discussed, by avoiding development in areas supporting sensitive plant and animal species and by providing open space easements, the proposed project contributes to fulfillment of the County's goals to conserve areas with sensitive plants or irreplaceable, high quality plant and animal communities. By avoiding development on steep slope areas, the proposed project will leave the vast majority of on-site canyons and major rock outcroppings undisturbed, and would therefore contribute to the goal of preserving significant natural features of the County.

Recreation Goal:

"Encourage the acquisition of significant historic sites (including significant archaeological sites) and their immediate environs by public agencies or private organizations interested in our historical and cultural heritage."

Through preservation and avoidance of important cultural resource sites, the proposed project allows the Salvation Army, a private organization, to preserve cultural heritage.

Floodplains

Goal I: Health and Safety

"Protect life and property by regulating uses in areas subject to flooding."

"Reduce the need for construction of major flood control improvements."

There are no Federal Emergency Management Agency (FEMA)-mapped floodplains on or in the general vicinity of the project site. The proposed project has been designed so that no structures would be subject to inundation that would result from a 100-year storm, which is defined as a storm that has a one percent probability of being equaled or exceeded in any one year. Additionally, on-site wetlands, which provide floodwater retention, would be preserved under the proposed project. Therefore, these goals do not apply to the proposed project.

"Control development to assure a minimal adverse polluting effect on reservoirs, lakes, streams, rivers and ground water supplies."

Development of the proposed project would be performed in accordance with all water quality regulations. A National Pollutant Discharge Elimination System (NPDES) permit would be obtained, and a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented (EIR Section 1.1.1.2 and 6.1.3). The project would be in compliance with the County's updated Flood Control District Guidelines and Land Development Guidelines to minimize adverse water quality and drainage impacts throughout the life of the project. As described in EIR Section 6.1.3, in order to prevent water quality

impacts due to septic system problems, the tanks would be pumped annually to limit buildup of inorganic solids, the amount of water going through the septic tank would be regulated to prevent overloading of the system, the leach fields and leach lines would be regularly flushed to prevent high concentrations of nitrates and phosphates, and annual inspections of the septic system would be performed to ensure proper operation and efficiency of the tanks. By conforming with water quality regulations and ensuring proper functioning of the camp's wastewater system, the proposed project would contribute to fulfillment of the health and safety goal to assure a minimal adverse polluting effect on reservoirs, lakes, streams, rivers and ground water supplies.

Agricultural Preserves and Open Space Easements and Open Space and Design of Private Lands

Goal I: Health and Safety

"Protect life and property by regulating use of areas subject to flooding, landslides, high fire hazard and high earthquake potential."

As previously discussed, the project area is not located in a flood-prone area. Proposed development would be generally located on the flatter developed portions of the site and therefore would not encourage erosion and potential landslides. Fire protection measures such as fire setbacks and installation of sprinkler systems, and the provision of emerging fire fighting water flow and capacity, have been incorporated into the proposed project in order to prevent losses due to fire. The Fire Protection Plan (FPP) for the project site includes a <u>number of fire protection measures</u> redundant layering of protection methods-that have been proven to reduce risk to people and structures from wildfires. The FPP The combined fire protection system designed for structures on this site includes, but is not limited to, customized fuel modification zones with a minimum two times and up to 20 times the width of predicted flame length heights; enhanced, ignition-resistive construction; interior sprinklers; and infrastructureral improvements only possible with the implementation of the site plans proposed in Alternatives I and II. In addition, the project would improve water availability and flow by providing additional fire hydrants, water pipeline upgrades, and a 650,000-gallon water tank (expandable to 800,000 gallons). FPP requires water availability and flow would be improved with additional fire hydrants and water pipeline upgrades throughout the Camp, and a 260,000 gallon water tank fed by the Ramona Municipal Water District. The new 260,000 gallon water tank would be located placed near the existing 10,000-gallon water tank, which will remain in service. The multipurpose building Camp will also be considered a Shelter-in Place "shelter inplace" facility for safe sheltering from wildfire if relocation of campers is not feasible..., which means that when relocation of campers is not feasible, a designated area of the Camp will be used to accommodate people on site during a wildfire emergency. Theis proposed fire protection measures fire protection system is are designed to drastically reduce the wildlife risk on the project site and to provide a safe area for sheltering during the wildfire, if necessary. The project site is not located in an Alquist-Priolo Special Studies Zone, or an area with a high earthquake risk (Jennings, 1994). By focusing development on lands not prone to flooding and earthquakes, by limiting intrusion on steep slopes to prevent landslide risk, and by incorporating fire safety elements into the plan, the proposed project contributes to the health and safety goal to protect life and property by regulating use of areas subject to flooding, landslides, high fire hazard and high earthquake potential.

Regional Land Use Element

Goal 1.1: "Urban growth be directed to areas within or adjacent to existing urban areas, and that the rural setting and lifestyle of the remaining areas of the County be retained."

The project is the expansion of a camp facility that would not require any off-site expansion of public facilities or utilities, and as such would not contribute to urban growth or other growth inducing impacts in the area. The site plan has been carefully designed to preserve the rural character of the area to the fullest extent feasible by designing the project with low-scale, one- and two-story structures that would be clustered in five general areas to minimize building massing sprawls, landform alteration and vegetation removal. Substantial open space has also been worked into the site plan to minimize disruption to the natural form of the terrain, and to minimize building massing. The design and architecture of the proposed buildings would be rustic in character, built with wood, brick or masonry, and finished with exterior earth-tone colors. In addition, the project includes a Landscape Concept Plan that would be implemented for all development phases as part of this project. By retaining use of the site as a camp and retreat and by designing buildings in a style and scale consistent with surrounding development, the proposed project contributes to the Regional Land Use Element Goal to direct urban growth to areas within or adjacent to existing urban areas, and retain the rural setting and lifestyle of the remaining areas of the County.

Goal 1.2: "Growth be phased with facilities."

The proposed project includes the development of appropriate internal infrastructure for the development and would not require any external facility upgrades or new facilities. By providing appropriate infrastructure concurrently with proposed development and restricting development such that no external new facilities or upgrades are necessary, the proposed project contributes to the County's Regional Land Use Element goal to phase growth with facilities.

Goal 2.1: "Promote wise uses of the County's land resources, preserving options for future use."

By focusing development in previously disturbed areas and creating a vast open space easement, the proposed project contributes to the Regional Land Use Goal to promote the wise use of the County's land resources, preserving options for future use.

Goal 2.3: "Retain the rural character of non-urban lands."

Through designing buildings in a style and scale that is consistent with surrounding development, the proposed project contributes to the Regional Land Use Element goal to retain the rural character of non-urban lands.

Goal 2.6: "Ensure preservation of contiguous, regionally significant open space corridors."

Although the project site contains a local wildlife corridor, the corridor is not considered a regional corridor due to its limited width, existing constraints (Mussey Grade Road and adjacent development), and a lack of connectivity to regionally significant open space east of the site. Therefore, this goal does not apply to the project.

Goal 3.1: "Protect lands needed for preservation of natural and cultural resources; managed production of resources; and recreation, educational, and scientific activities."

As previously discussed, by siting development in previously disturbed areas and avoiding sensitive habitat to the maximum extent practicable; preserving and avoiding development on or near significant cultural resources; siting development in areas not utilized for managed production of resources; and, retaining open space for the proposed project use of recreation, education and scientific activities, the proposed project is consistent with the Regional Land Use Element goal to protect lands needed for preservation of natural and cultural resources; managed production of resources; and, recreation, educational, and scientific activities.

Goal 3.2: "Promote the conservation of water and energy sources."

The proposed project incorporates the use of standard energy and water conservation techniques into new structures and site landscaping to the maximum extent practicable. New buildings would feature use of low-flow water fixtures (e.g., toilets, showers and sinks) and native drought tolerant species would be utilized for new landscaping. Building design would employ the most contemporary and efficient designs with the use of insulation and low energy consumptive equipment. Deciduous trees would be planted to provide shade during the summer months while allowing winter sunshine on buildings. As such, the proposed project contributes to the goal to promote the conservation of water and energy sources.

Circulation Element

Goal: "It is the intent of the Circulation Element to preserve a corridor uninhabited by any permanent structure for future road right-of-way for each and every road shown on the Circulation Element."

The area of Mussey Grade Road that is near the proposed project is not shown on the Circulation Element. Because no Circulation Element roads are in the vicinity of the project site, the proposed project does not conflict with the goal to preserve such a corridor (Pers. Comm., Ortiz, 2001).

Recreation Element

Goal: "Enhance the physical, mental and spiritual well being of County residents by providing opportunities for relaxation, rest, activity, education, and relationships with their neighbors."

The project proposes to expand an existing camping and retreat facility that provides substantial benefits to County residents. Proposed facilities would provide an opportunity for underprivileged and "at risk" youth to enjoy outdoor recreation and education. The camp also provides a retreat facility for families, senior citizens and men's and women's camps. By providing recreational and retreat activities to County residents, the proposed project is consistent with this goal.

Goal: "Provide a system of public parks, riding and hiking trails, and outdoor recreation facilities which not only preserve significant areas of natural beauty for citizen enjoyment, but which also serve the needs of the citizens in their immediate environments. This system is to be augmented by private outdoor recreation facilities that are compatible with the goals and objectives of the public system."

There are approximately three miles of trails on the camp property. These trails are used by San Diego youth that attend the camp, many of whom would not have had such experiences without the camp. By expanding the camp as proposed, the existing trails would be enjoyed by a greater number of such youth. By continuing and expanding the usage of on-site trails, the proposed project is consistent with this goal.

Seismic Safety Element

Goal:

"...to minimize the loss of life and destruction of property in San Diego County by making planning recommendations giving consideration to seismic and geologic occurrences and their long-range impact on the community."

By developing an area located outside of Alquist-Priolo Special Studies Zones and constructing all new development in conformance with the Uniform Building Code as adopted by the County of San Diego, the proposed project would be consistent with the goal to minimize the loss of life and destruction of property in San Diego County.

Public Safety Element

Goal: "Minimize injury, loss of life and damage to property resulting from fire, geologic or crime occurrence."

The project area is a rural setting and supports large areas of flammable native and non-native vegetation. A Fire Protection Plan (FPP) has been prepared for the Salvation Army Divisional Camp and Retreat, based on the site layout described in Reduced Project Alternative I. The purpose of the FPP is to describe generate and memorialize fire safety requirements that will provide a reduced the level of risk for the Camp and its visitors. The fire safety measures in the FPP include, but are not limited to, requirements for water supply, fuel modification, access, building ignition and fire resistance, fire protection infrastructure (e.g., fire hydrants, water pipelines) and a Fire Safety Coordinator. identifies the fire risk associated with the proposed expansion land uses (as identified in MUP P70-379W2) and identifies requirements for water supply, fuel modification, access, building ignition and fire resistance, fire protection systems, defensible space, and vegetation management, among other pertinent criteria for fire protection.

The campground has an existing Evacuation and Fire Safety Plan Disaster Plan, or Emergency Evacuation Plan, in place that has been reviewed by the Ramona Fire Department. Substation of the Sheriff's Department. This Disaster Plan—The Plan includes instructions for campers and staff, including initial steps that must be followed; evacuation procedures; fire prevention policies and procedures; and emergency transportation guidelines.

The effectiveness of the Salvation Army's Disaster Plan, the predecessor to the Fire Protection Plan, was demonstrated during the October 2003 fire disaster. Two groups had contracted use of the site when the fire struck the property. The Salvation Army had begun their procedures to self evacuate the site when the Sheriff arrived at 7:20 a.m. on October 26th to request the camp be evacuated. The Salvation Army's Disaster Plan procedures were followed and no injuries or loss of life occurred. However, several structures were burned including three staff residences, one activity building, two camp cabins, one infirmary, one maintenance shed along with vehicles and equipment, and one tent/platform.

As described previously, potential seismic impacts would be mitigated to below a level of significance with proper engineering design of all structures, per the Uniform Building Code as adopted by the County of San Diego.

It is not anticipated that the proposed project would result in an increase in crime in the area. Operations at the existing camp has not resulted in any police call to date and staff to camper ratios will be relatively high, with approximately one staff member for every three campers, which will serve to minimize disorder and potential crime by camp attendees. Additionally, the remote nature of the area and the inaccessibility of transportation to campers would serve to prevent crime problems at or near the project site.

Through fire <u>safety requirements provided in the FPP, compliance with the County</u> <u>mitigation design</u> guidelines and a coordinated emergency plan; designing buildings in accordance with the Uniform Building Code and continuing operations of a camp facility with no record of crime problems, the proposed project would be consistent with the Public Safety Element goal to minimize injury, loss of life and damage to property resulting from fire, geologic or crime occurrence.

Public Facilities Element

Section 2 – Coordination Policies:

"Assure that growth is limited to areas where adequate public facilities exist or can be effectively provided."

The project site is located in an area with adequate public facilities. No new public facilities would be required for the project. As such, the project does not conflict with the goal to assure that growth is limited to areas where adequate public facilities exist or can be effectively provided.

"Development projects will be required to provide or fund their fair share of all public facilities needed by the development."

Although no new public facilities or facility upgrades are required for the project or its associated impacts, the Salvation Army has volunteered a public benefit contribution of \$5,000 toward County planned improvements to a local intersection (EIR Section 1.1.1.2). In addition, tIhe project will pay the required IIF fee for cumulative impacts to regional roads and construct includes a 260,000 gallon 650,000-gallon water tank (expandable to 800,000 gallons). The water tank that will enhance fire fighting capabilities within the project area. As such, the proposed project complies with the policy that development projects fund their fair share of all public facilities needed by the development.

Section 3 – Park and Recreation Goal:

"Parks and recreation facilities that meet the recreational, conservation, preservation, cultural and aesthetic needs of County residents and visitors of all ages, income levels, ethnic groups and physical abilities."

As previously discussed, the project proposes to expand an existing camp retreat facility that provides substantial benefits to the community with the provision of existing hiking trails, and proposed new facilities including an educational camp and expanded recreation/playing fields for camp users. The camp would provide an opportunity for underprivileged youth to enjoy outdoor recreation, such as hiking, education, campfires, etc. The camp also provides a retreat facility for families, senior citizens and men's and women's camps. By providing youth camping experiences and a retreat center for other groups, the proposed project would be consistent with the goal to provide parks and recreation facilities that meet the recreational, conservation, preservation, cultural and aesthetic needs of County residents and visitors of all ages, income levels, ethnic groups and physical abilities.

Section 4.2 – Transportation Policies:

1.1 "New development shall provide needed roadway expansion and improvements on-site to meet the demand created by the development, and to maintain a Level of Service "C" on Circulation Element Roads during peak traffic hours. New development shall provide off-site improvements designed to contribute to the overall achievement of a Level of Service "D" on Circulation Element Roads."

There are no roads on the project site classified as Circulation Elements Roads. Nevertheless, all on-site roads will be improved to a width of 24 feet except <u>locations where width was reduced to avoid sensitive biological resources</u>. The road width reductions were as—approved by the Ramona Fire Protection <u>Municipal Water</u> District and the County of San Diego Departments of Planning and Land Use and Public Works, where road improvements would impact sensitive biological resources (EIR Section 1.1.1.2). The mitigation proposed in EIR Section 3.1.10 would contribute to the overall achievement of LOS D or better for off-site Circulation Element roads. Therefore, the proposed project complies with this policy.

2.1 "New development shall be required to contribute its fair share toward financing transportation facilities."

Although the proposed project will not result in significant direct or cumulative impacts to the transportation network, the applicant has volunteered a public benefit contribution of \$5,000 toward County-planned improvements to the SR-67/Dye Road/Highland Valley Road intersection. The project will pay the required TIF fee for cumulative impacts to regional roads. As such, the proposed project is consistent with this policy.

Conservation Element

a. Water Policies

Policy 5: "Water distribution systems should be designed and constructed to economically accommodate future use of reclaimed or desalinized water when technologically and economically feasible."

All expanded on-site water distribution systems would be built to accommodate future use of reclaimed or desalinized water. In other words, the on-site water distribution system will be designed to allow the inclusion of additional pipelines should the Ramona Municipal Water District develop reclaimed or desalinized water systems within the project area in the future. As such, the proposed project is consistent with this policy.

Policy 8: "Wastewater discharges shall not adversely affect the beneficial uses of receiving water."

By conforming with all local, state and federal water quality regulations and ensuring proper functioning of the camp's wastewater system, the proposed project complies with the policy that wastewater discharges not adversely affect receiving waters.

Policy 10: "Storm drain runoff should be planned and managed to minimize water degradation, to reduce the waste of fresh water, to enhance wildlife, and to reduce the impact of erosion."

A Storm Water Pollution Prevention Plan (SWPPP) for both construction and operation activities has been prepared which reduces stormwater runoff impacts. Through preparation and implementation of a SWPPP and MUP approval conditions (EIR Section 1.1.1.2), the proposed project is in conformance with the policy.

b. Vegetation and Wildlife Policies

Policy 1: "The County will act to conserve and enhance vegetation, wildlife and fisheries resources."

Through a design that minimizes impacts to sensitive habitat mitigates all physical biological impacts onsite, and dedicates an open space easement, the proposed project is consistent with the policy to conserve and enhance vegetation, wildlife and fisheries resources.

Policy 5: "San Diego County shall encourage the use of native plant species in review of landscaping and erosion control plans for public and private projects."

Through use of native drought tolerant species for project landscaping, the proposed project is in conformance with the County policy of using native plant species in review of landscaping and erosion control plans.

Policy 9: "When significant adverse habitat modification is unavoidable, San Diego County will encourage project designers to provide mitigating measures in their design to protect existing habitat."

As outlined in EIR Section 2.2, all physical biological impacts have been mitigated on-site and will be included in a dedicated open space easement. However, impacts to habitat associated with the Retreat Center and access road could be avoided with adoption of one of the two project alternatives identified in Chapter 4. Therefore, the proposed project is not consistent with this Conservation Element policy. However, approval of one of the Reduced Alternatives would be consistent with the policy because the Retreat Center would be relocated to avoid impacts to habitat.

c. Mineral Policies

Policy 8: "The County will, to the extent practical, protect and preserve unique geological features from destruction, damage or loss."

No unique geologic features are located within the project site. As such, this policy does not apply to the proposed project.

Policy 9: "The County will encourage and initiate efforts to recycle waste products as construction materials.

Such products include but are not limited to glass, broken concrete, asphalt, asphaltic concrete, and compressed trash."

Minimal development removal would occur under the proposed project; however, whenever feasible, any recoverable construction materials would be separated and delivered to a recycling facility. Whenever feasible and not cost or time prohibitive, recycled building materials shall be used in construction activities on-site. By recycling and using recyclable and recycled materials whenever feasible, the proposed project contributes to the County goal to recycle waste products and construction materials.

d. Soil Policies

Policy 9: "To prevent erosion and slippage in man-made slopes approved low maintenance trees, bushes and grasses which establish themselves quickly should be planted."

Construction of the Retreat Center access road would require 2:1 cut slopes into the hillside, and would vary from one foot to 20 feet in height, with most slopes ranging between ten and 15 feet in height. The access road cut slopes, as well as other cut slopes, would be contour-graded to integrate with the natural contours of the adjoining topography and revegetated with native vegetation as detailed in the Landscape Concept Plan. (Note: This access road would not be constructed under Reduced Project Alternative I.)

e. Cultural Sites Policies

- Policy 1: "The County shall take those actions, which will seek to conserve and protect significant cultural resources."
- Policy 5: "Encourage use of open space easements in the conservation of high-value cultural resources."

By either avoiding or placing significant cultural sites in easements, as previously discussed, the proposed project is consistent with the policy to take actions to conserve and protect significant cultural resources.

B. Ramona Community Plan

Community Character

Goal: "Preserve and enhance the existing rural atmosphere of the Ramona Community and encourage land uses, structural designs, and landscaping which are compatible with a country lifestyle."

By designing the project with low-scale, one- and two-story structures that would be clustered in five general areas to minimize building massing, landform alteration and vegetation removal, the proposed project is consistent with the local community character. Substantial open space has also been worked into the site plan to minimize disruption to the natural form of the terrain, and to minimize building massing. The design treatment of the proposed buildings would be rustic in character, built with wood, brick or masonry, and finished with exterior earth-tone colors. The total proposed building and lot coverage is estimated at only two percent. Most buildings are relatively small in scale (1-2 stories). Larger buildings proposed are of similar scale to barns, stables, or storage structures for agricultural equipment – all of which exist in areas immediately surrounding the camp.

In addition, the project includes a Landscape Concept Plan (proposed project landscaping is included in Enlarged Area Site Plans, Figures 1-9 through 1-11) that would be implemented for all development components. The plan includes substantial landscaping to soften and screen proposed buildings with native drought-tolerant species that are consistent with existing on-site vegetation. These project features preserve the rural character of the area and the Community Plan. Therefore, the project would be consistent with this plan objective.

Policies and Recommendations:

- 1. "Mature trees should be conserved wherever possible in all public and private development projects."
- 11. "Site design shall minimize the destruction of existing trees, both native and non-native."

The proposed project includes careful site planning to avoid mature stands of oaks and other mature native trees through project design. The Landscape Concept Plans illustrate existing stands of oaks and trees that would remain with implementation of the proposed project. Proposed mitigation for impacted oaks will reduce impacts to such trees to below a level of significance (EIR Section 2.2). By avoiding native tree stands to the maximum extent practicable, or mitigating impacts to oaks, the proposed project is consistent with the Community of Ramona's policy to conserve mature trees.

12. "Floodways shall be maintained in as natural a state as possible. Riparian vegetation shall be maintained or enhanced in and along the existing floodways and creeks."

The project locates all proposed development outside of floodways and significantly avoids on-site drainages and adjacent vegetation. The proposed Retreat Center access road has been designed to the narrowest width allowed by the County and Ramona Fire Department and would maintain the existing drainage characteristics through the use of two 36-inch box culverts. Therefore, the project is consistent with the Community Character goal to maintain floodways in as natural state as possible.

13. "Projects that propose to fill the floodplain fringe shall landscape the new bank of the creek to blend with the natural vegetation and enhance the natural edge of the creek."

The proposed project has been designed to avoid or minimize encroachment into floodplain fringe areas. Any required encroachment would be contoured and landscape to blend with the natural vegetation and enhance the existing creek environment; therefore, the proposed project is consistent with the policy that floodplain embankments be landscaped to blend with the natural vegetation and enhance the natural edge of the creek.

- 14. "No concrete channelization or concrete bank protection of the floodway shall be allowed unless such materials are necessary to protect structures existing before this Plan is adopted."
- 15. "Only natural materials shall be used for bank protection, including but not limited to, rocks or gabions."

The proposed project has been designed to avoid or minimize encroachment into creek areas. No concrete channelization or concrete bank protection is proposed. Where bank protection is required, only

natural materials (e.g., Natural Stone, riprap) would be used. Therefore the proposed project is consistent with these policies.

17. "Grading shall be minimized. Street, walkways, buildings, retaining walls and other improvements shall not modify the natural landforms."

As previously discussed, the proposed project has been designed to avoid or minimize impacts to the natural landform features and encroachment into hillside areas. The project locates clustered development in the relatively level previously developed portions of the site. Therefore the proposed project is consistent with the goal to minimize grading activities.

18. "Open space easements shall be placed on all significant stands of oak and steep slopes."

The proposed project has been designed to minimize impacts to sensitive habitat, including oak woodlands and riparian forests. The project proposes to dedicate designation of a 109 acre 278.80 acres as a biological open space easement, which includes significant stands of oak and steep slopes. Therefore, the proposed project is consistent with this Community Character policy. (Note: the Reduced Project Alternative I would dedicate 395.57 acres as a biological open space easement.)

Land Use

General Land Use Goal:

"Provide a land use which will give the Ramona Community Planning Area the opportunity to remain economically and socially varied. Conserve the best of the Ramona of yesterday while planning for the Ramona of tomorrow."

The project proposes to expand an existing camping and retreat facility that provides substantial benefit to the community. The project would provide a facility that would meet the needs of the community and San Diego County. The proposed project includes a new educational camp and expanded recreational/playing fields. The proposed project has been designed to preserve the rural character of the area, while meeting the basic objectives of the project and is therefore consistent with these goals.

"Ridgeline development should be discouraged. It should only be allowed if a viewshed analysis shows only minimal impact on adjacent properties and scenic roads identified in the Scenic Highways Element of the General Plan."

The proposed project has been designed to avoid or minimize ridgeline development. The proposed Retreat Center would be located on a small, isolated hill and would be stepped into the hillside to minimize view impacts from adjacent properties. The Retreat Center will follow the natural contour and be landscaped with native drought-tolerant species to soften and screen proposed buildings. As discussed in EIR section 2.5, which includes viewshed analysis, through avoiding and minimizing ridgeline development, the proposed project would not significantly impact the visual quality of the project area and is consistent with this policy.

Conservation

Goal: "Encourage the conservation, preservation, and wise utilization of resources in the Ramona Planning Area."

As previously discussed, the proposed project has been designed to avoid sensitive biological resources and incorporates the use of standard energy and water conservation techniques into new structures and site landscaping. New buildings would feature use of low-flow water fixtures (e.g., toilets, showers, and sinks) and drought-tolerant species would be utilized for new landscaping. Building design would employ the most contemporary and efficient designs with the use of insulation and low energy consumptive equipment. Deciduous trees would be planted to provide shade during the summer months while allowing winter sunshine on buildings. By avoiding impacts and minimizing resource consumption, the proposed project is consistent with the goal to encourage the conservation, preservation, and wise utilization of resources in the Ramona Planning Area.

Open Space

Goal: "Encourage a pattern of open space lands for the preservation of natural resources, for resource production, for outdoor recreational uses, and for public health and safety."

By incorporating an open space easement of 109 acres 278.80 acres into the design, the proposed project is consistent with the goal to encourage a pattern of open space lands for the preservation of natural resources. (Note: the Reduced Project Alternative I would dedicate 395.57 acres as a biological open space easement.)

Recreation

Goal: "Develop a comprehensive plan of local, neighborhood, community and regional parks and facilities directed to the needs of all age levels and which use, whenever feasible, outstanding natural features of the planning area."

The project proposes to expand an existing camp retreat facility that provides substantial benefits to the community with the provision of existing hiking trails, and proposed new facilities including an educational camp area and improved recreation/playing fields for camp users. The proposed project includes a recreational facility for the local San Diego community, regardless of geographical area, age, ethnicity or gender. The camp currently provides an opportunity and space for underprivileged youth to enjoy outdoor recreation. The camp also provides a retreat facility for families, senior citizens and men's and women's retreats. By providing a recreational facility for area youths and adults, the proposed project is consistent with the goal to develop a comprehensive plan of local, neighborhood, community and regional parks and facilities directed to the needs of all age levels and which use, whenever feasible, outstanding natural features of the planning area.

C. Ramona Design Guidelines

The General Design Guidelines Applicable to All Developments ("General Guidelines") address the following nine issues areas: site design; architectural character; landscape character; preservation of trees; climate and energy conservation; signage; lighting; building equipment and services areas; and,

preservation of historic resources. General Guidelines applicable to the project are discussed below. Please refer to EIR Sections 2.4 and 2.5 for an analysis of project consistency with applicable Ramona Design Guidelines related to noise and aesthetics, respectively.

Preservation of Trees Guidelines

a. Site development plans should demonstrate a diligent effort to retain as many native oak and other significant trees as possible.

The proposed project includes careful site planning to avoid mature stands of oaks and other important trees through project design. Any oaks that cannot be avoided will be mitigated to below a level of significance (EIR Section 2.2, Appendix B). By avoiding impacts to trees on-site and mitigating for unavoidable impacts, the proposed project demonstrates a diligent effort to retain as many native oak and other significant trees as possible.

2.7.4 Mitigation Measures

Although impacts to sensitive biological habitats have been either avoided or mitigated to below a level of significance, such impacts associated with the Retreat Center and access road conflict with Policy 9 of the General Plan Conservation Element. The existence of two project alternatives, discussed in EIR Chapter 4, that avoid this impact renders this conflict significant and unmitigable under the proposed project.

2.7.5 Conclusions

The proposed project will not result in a land use compatibility impact and is consistent with the rural community character of the project area. The project will not physically divide an established community. However, the <u>Applicant's Preferred Project proposed project</u> will conflict with a land use policy resulting in a significant and unmitigable land use/planning impact. (Note: the Reduced Project Alternative I would avoid the unmitigated impact.)

TABLE 2.7-1 Land Use Summary

LAND USE	EXISTING	EXISTING ACREAGE	PROPOSED	PROPOSED ACREAGE	TOTAL
Structures and	Central Dining		Expanded cabin		
Visitor Use Areas	facility; small	15.36	component; additional	57.29	61.46
	infirmary;		yurts; nature study and		
	maintenance		educational camp;		
	building and yard;		new meeting area and		
	five masonry cabins;		ancillary structures;		
	meeting facility (the		dining facility; multi-		
	Lodge") and five		purpose building,		
	guest cabins; and,		indoor mini-theater;		
	six yurts		and staff housing		
Vehicular Areas	Roads and parking		New roads and		
	areas.	14.43	parking areas	1.81	16.24
Infrastructure	10,000-gallon water		260,000 650,000-gallon		
	tank and septic	2.78	water tank and	30.22	33.00
	tank and leach		expanded septic tank		
	field system		and leach field system		
Recreation Use	Recreation playing		Recreation playing		
Areas	fields; play courts;	2.87	fields; play courts;	0.08	2.79
	swimming pool and		swimming pool and		
	bathroom/showers;		bathroom/showers;		
	and hiking trail		rope course		
Undisturbed/	Undisturbed/		Undisturbed/	355.51	
Landscaped and	Landscaped Areas	542.56	Landscaped Access		
Open Space					464.51
Easement Areas			Open Space Easement	109 <u>278.80</u>	
			Areas	<u>acres</u>	
				(Note: 395.57	
				<u>acres under</u>	
				<u>Reduced</u>	
				<u>Project</u>	
				Alternative I)	

Note: All acreage calculations for the Applicant's Preferred Project include 100-foot fire clearance around buildings, fire clearance areas around roads, and other areas considered disturbed, such as oaks near leach fields, etc. Acreage calculations for Reduced Project Alternative Lincludes the expanded fuel modification zones as required by the FPP.

Source: Matalon Architecture & Planning, 2003.